



United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221



DATE: OCT 10 2013

REPLY TO
ATTN OF: CBFO:OQA:MPN:MAG:13-2069:UFC 2300.00

SUBJECT: Review and Verification of the Corrective Actions Submitted in Response to and Supporting Closure of CAR 13-037 Resulting from CBFO Surveillance S-13-23

TO: Mr. Benjamine Roberts, DOE-ID

The Carlsbad Field Office (CBFO) has completed review and verification of the corrective actions submitted in response to CBFO Corrective Action Report (CAR) 13-037, which resulted from CBFO Surveillance S-13-23, Concern Classification Evaluation, effected by CAR 13-023. The results of the verification are documented on the attached CAR Continuation Sheet, and indicate that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 13-037 is considered closed.

If you have any questions concerning closure of CAR 13-037, please contact me at (575) 234-7483.

Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment

cc: w/attachment

- | | | | |
|------------------------|-----|-------------------|----|
| O. Vincent, CBFO | *ED | R. Joglekar, EPA | ED |
| D. Miehlis, CBFO | ED | S. Ghose, EPA | ED |
| J. R. Stroble, CBFO | ED | R. Lee, EPA | ED |
| M. Pinzel, CBFO | ED | J. Kieling, NMED | ED |
| N. Castaneda, CBFO | ED | T. Kliphuis, NMED | ED |
| J. Cooper, DOE-ID | ED | S. Holmes, NMED | ED |
| J. Wells, DOE-ID | ED | R. Maestas, NMED | ED |
| T. Jenkins, DOE-ID | ED | C. Smith, NMED | ED |
| D. Haar, AMWTP | ED | J. Harvill, CTAC | ED |
| G. Byram, AMWTP | ED | R. Allen, CTAC | ED |
| G. Tedford, AMWTP | ED | B. Pace, CTAC | ED |
| E. Schweinsberg, AMWTP | ED | P. Hinojos, CTAC | ED |
| A. Morse, AMWTP | ED | G. White, CTAC | ED |
| T. Peake, EPA | ED | Site Documents | ED |
| L. Bender, EPA | ED | CBFO QA File | |
| E. Feltcorn, EPA | ED | CBFO M&RC | |

*ED denotes electronic distribution

131009



CAR CONTINUATION SHEET

1. CAR No: 13-037

2. Activity No: S-13-23

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Block # 17 Acceptance of Corrective Action Completion:

The Carlsbad Field Office (CBFO) has performed an evaluation of the response and evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 13-037, identified during CBFO Surveillance S-13-23, Concern Classification Evaluation, effected by CAR 13-023. The response and closure documentation was submitted via Department of Energy, Idaho Operations Office memorandum dated September 26, 2013, from Mr. James R. Cooper, Deputy Manager, Idaho Cleanup Project, to Mr. J. R. Franco, Manager, Carlsbad Field Office.

The following is a restatement of the four conditions subject to CAR 13-037. The evaluation of Advanced Mixed Waste Treatment Project's (AMWTP's) response and actions taken is then described for each of the types of actions to be addressed, as required by block 12 of the CAR.

1. During the review of Nonconformance Report (NCR) 68515, Supercompactor Glovebox Glass Cracked by Tipping Material, the audit team noted the Quality Assurance (QA) verification completion was done on 1/25/12. Attached to the Nonconformance Report (NCR) in Track Wise was a Temporary Physical Change Record (TPC-0216), Form-1508. TPC-0216 was completed through the Installation Approval Section (page 2 of 6); however, the subsequent sections of the form for documenting the completion of installation were incomplete. Also attached to the NCR in Track Wise was Work Order #396618, which completed the temporary installation on 1/25/12. Quality Assurance (QA) did not verify that TPC-0216 was completed prior to the closure of NCR 68515.
2. Review of completed Management Assessment Reports in Track Wise indicated that one management review was completed later than 10 days after the Track Wise notification was provided.
3. The AMWTP QA program did not have a current Delegation of Authority Letter. QA personnel other than the QA Manager have been performing review and concurrence of classifications of structures, systems, and components in the Maintenance Management System, with no current delegation of authority documentation. The only documentation available was Delegation of Authority Letter C-2009-0382, dated 8/19/2009. The QA Manager and organization structure have changed since that letter was issued.
4. The Waste Isolation Pilot Plant (WIPP) Training Requirements Implementation Matrix, LST-RTQP-03-IM, Rev. 0, is not referenced in AMWTP training program procedures. Training program procedures reference Training Implementation Matrix MP-RTQP-14.20, which does not address WIPP Waste Analysis Plan training requirements.

REMEDIAL ACTIONS

1. No remedial action was taken for Condition #1. As noted in the response to the CAR, during CBFO Audit A-13-01, the auditor was provided a copy of NCR 68515 indicating a "use-as-is" disposition with an engineering justification (EDF-0512) that the crack in the glovebox remains sufficiently intact to maintain glovebox confinement, but has the potential to further degrade with use. In accordance with EDF-0512, AMWTP initiated a TPC request to install a temporary external containment device to provide additional protection in the event of a window failure until the window could be replaced. This device was installed per Work Order #396618 in response to EDF-0512 and TPC-0216, respectively. Although the subsequent sections of TPC-0216 should have been completed to indicate the fulfillment of the request, the incomplete condition did not negatively impact the configuration of the glovebox.
2. No remedial action was taken for Condition #2. As noted in the response to the CAR, during CBFO Audit A-13-01, the auditor was provided copies of 162 Management Assessment Reports for review. Of the 162 reports, only one was identified as being reviewed and closed by the manager later than 10 calendar days as procedurally required. The auditor was further provided with evidence that the self-imposed requirement was being removed from the procedure with a revision date scheduled in Track Wise for December 2013. Although

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the procedure revision had not yet been implemented, the entry in Track Wise should have been considered sufficient for abating the significance of the concern identified during the audit.

3. When the condition was identified by the auditor, AMWTP initiated a Delegation of Authority Letter, approved by way of signature and transmitted to records management on October 16, 2012. The action taken by AMWTP on October 16, 2012 should have been considered sufficient to abate the concern identified during the audit.
4. When the condition was identified by the auditor, AMWTP initiated Document Change Request (DCR) #11777 and DCR #11779 to revise MP-RTQP-14.4 and MP-RTQP-14.16 to reference LST-RTQP-030IM, which addresses WIPP Waste Analysis Plan training requirements. The action taken by AMWTP to revise the aforementioned procedures should have been considered sufficient to abate the significance of the concern identified during the audit.

Verification:

The remedial actions taken by AMWTP for Condition #3 and Condition #4 are deemed appropriate and acceptable. The decision by AMWTP to not take remedial actions for Condition #1 and Condition #2 is also deemed appropriate and acceptable for the reasons described above.

INVESTIGATIVE ACTIONS

- 1-4. Although the CAR required that investigative actions be included in the AMWTP response, due to the nature of the concerns and the AMWTP provided responses, investigative actions would not have provided an appreciable degree of benefit for precluding recurrence. Accordingly, the AMWTP decision to not perform investigative actions is deemed appropriate and acceptable.

ROOT CAUSE DETERMINATION

Not required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

- 1-4. The AMWTP actions taken, supported by the completion evidence provided in the response to the CAR, are deemed appropriate and acceptable.

ACCEPTANCE

Based on the results of the review of the response and objective evidence included in the CAR 13-037 closure package, it is recommended that CAR 13-037 be closed.


 Verification Performed By: Berry D. Pace


 Date 10/7/13